

ZMO LAW PLLC

MEMO ENDORSED

April 30, 2021

Via ECF

Hon. Valerie E. Caproni
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
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DATE FILED: 4/30/2021

RE: *United States v. Stanley Hampton*, 20 Cr. 667

Dear Judge Caproni:

This office represents Stanley Hampton in the above-captioned matter. We write to request a modification of Mr. Hampton's release conditions to remove the home detention requirement and replace it with a curfew enforced through electronic monitoring. I have spoken to Pretrial Services Officer, Ashley Cosme, who does not object to this request as long as Pretrial Services is permitted to set the curfew time. I have also spoken to the Government, which defers to Pretrial.

Mr. Hampton was released on bond on December 21, 2020. Since his release, Mr. Hampton has gained full-time employment at a food warehouse and has been blessed with a newborn son. Mr. Hampton has remained compliant with the conditions of his release, but his current release conditions make it difficult for him to commute to and from work and to help run errands for his child. Therefore, I respectfully request that Mr. Hampton's home detention condition be lifted and that he instead be subject to a curfew, at a time set by Pretrial Services, enforced by electronic monitoring.

Thank you for your attention to this case.

Application GRANTED.

SO ORDERED.



4/30/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Very truly yours,

Victoria Nicole Medley

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CC: Christopher Clore (via ECF)

PTO Ashley Cosme (via email)